

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

DIGITAL MEDIA SOLUTIONS, LLC,)	
Plaintiff,)	
v.)	Case No. 1:19-cv-145
)	
SOUTH UNIVERSITY)	JUDGE DAN AARON POLSTER
OF OHIO, LLC, <i>et al.</i>)	MAGISTRATE JUDGE
Defendants.)	THOMAS M. PARKER

**UNITED STATES' STATEMENT OF INTEREST CONCERNING
POTENTIAL SALE OF WESTERN STATE UNIVERSITY COLLEGE OF LAW**

The United States respectfully submits this Statement of Interest, pursuant to 28 U.S.C. § 517,¹ in response to the Court's request that the United States provide a status update regarding the potential sale of the assets of Western State University College of Law ("WSCL"), a school owned indirectly by Dream Center Education Holdings LLC ("Dream Center").

The Department of Education ("Education") sent a letter to counsel for Westcliff University on June 25, 2019, which sets forth Education's position in the ongoing negotiations about this potential sale. The letter states, among other things, that if certain conditions are met, Education will release to Westcliff proceeds from a letter of credit (benefitting Education and providing, for Dream Center's regulatory obligations, limited payment assurance) in an amount equal to the actual payroll expense for WSCL faculty and staff for the month of July 2019 without requiring Westcliff to repay this sum.

¹ 28 U.S.C. § 517 provides that "any officer of the Department of Justice, may be sent by the Attorney General to any State or district in the United States to attend to the interests of the United States in a suit pending in a court of the United States, or in a court of a State, or to attend to any other interest of the United States."

June 25, 2019

Respectfully submitted,

JOSEPH H. HUNT
Assistant Attorney General

JUSTIN E. HERDMAN
United States Attorney

SUZANA K. KOCH
Assistant United States Attorney

/s/ Danielle A Pham
RUTH A. HARVEY
LLOYD H. RANDOLPH
DANIELLE A. PHAM
Attorneys
United States Department of Justice
P.O. Box 875, Ben Franklin Station
Washington, D.C. 20044-0875
Phone: (202) 514-7451
Email: danielle.pham@usdoj.gov

Attorneys for the United States

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on June 25, 2019, I electronically filed the foregoing UNITED STATES' STATEMENT OF INTEREST CONCERNING POTENTIAL SALE OF WESTERN STATE UNIVERSITY COLLEGE OF LAW with the Clerk of the Court by using the CM/ECF system, which will send a notice of electronic filing to all CM/ECF participants.

/s/ Danielle A. Pham
Danielle A. Pham
Trial Attorney
U.S. Department of Justice